

CORRES. CONTROL
INCOMING LTR NO.

00059 RFO3

DUE DATE
ACTIONBill Owens, Governor
Douglas H. Benevento, Acting Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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CONTROL
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STATE OF COLORADO

Colorado Department
of Public Health
and Environment

DIST.	LTR	ENC
BOGNAR, E.	X	
CROCKETT, G.		
DECK, C. A.	X	
DEGENHART, K.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D.W.	X	
FERRI, M.S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L.A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A.M.		
POWERS, K.		
RODGERS, A. D.		
SHELTON, D.C.	X	
SPEARS, M.S.		
TRICE, K.D.		
TUOR, N.R.		
WILLIAMS, J. L.		
PARSONS, D.	X	
Gibbs, F.	X	
BUTLER, L.	X	

January 27, 2003

Mr. Richard DiSalvo

Acting Assistant Manager for Environment and Stewardship

U.S. Department of Energy, Rocky Flats Field Office

10808 Highway 93, Unit A

Golden, CO 80403-8200

RE: Proposed Deviations From The Pre-Demolition Survey Plan (PDSP)

Dear Mr. DiSalvo:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the proposed deviations from the PDSP, wherein all of the exterior surfaces (excluding the loading docks and other specific areas) of the remaining buildings on the "western" portion of Rocky Flats Environmental Technology Site (Site) would be identified as a single unit for PDS radiological characterization as discussed in Mr. Legare's letter dated December 13, 2002. The Division is in agreement with the proposed deviations with the following concerns and clarifications:

- 1) Considering the broad scope of this deviation and the limited historical information provided with this proposal, the Division retains the right to request additional radiological characterization for any facility where additional historical information or recent events might identify specific concerns not currently recognized or addressed in this proposal. Any request for additional surveys, measurements, or samples should be addressed utilizing the consultative process.
- 2) Considering that this proposal includes some proposed Type 2 facilities, it needs to be recognized that these facilities are required to follow the characterization as outlined in the Reconnaissance Level Characterization Plan (RLCP) rather than the PDSP. All facilities at the Site are required to be properly characterized. The initially identified Type 1 facilities are supposed to be characterized utilizing the PDSP requirements, and the initially identified Type 2 and 3 facilities are to be characterized utilizing the RLCP requirements. This would seem to indicate that the proposed Type 2 facilities should be included in a unit separate from the proposed Type 1 facilities. As such, this should be recognized as a deviation from the RLCP (which requires a minimum of 30 uniformly distributed plus biased measurements) for these possible Type 2 facilities, as well as, the PDSP for the Type 1 facilities. However, the Division recognizes that, based on the information provided, the exterior of these proposed Type 2

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PATS/130Reviewed for Addressee
Corres. Control RFP1/30/03 By *bg*

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DOE ORDER #

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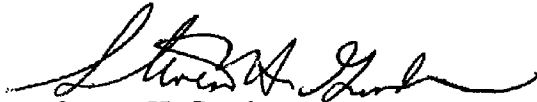
DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

IA-A-001256

facilities should not necessarily pose a substantially greater risk of being contaminated than the proposed Type 1 facilities in the "western" portion of the Site. Therefore, and considering the additional sampling as proposed for the possible Type 2 facilities included in this proposal, the Division believes it to be reasonable to include these Type 2 facilities in this proposed unit. The Division also agrees with this apparent deviation from the RLCP, and to allow the utilization of the results of this investigation in lieu of a separate investigation of the exterior of the proposed Type 2 facilities.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

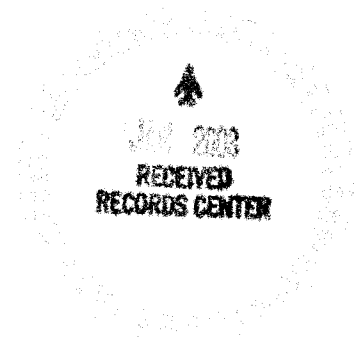
Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Duane Parsons, KH
Dave Shelton, KH

Tim Rehder, EPA
Frank Gibbs, KH
Administrative Records Building T130G



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